

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MOOG INC.,

Plaintiff,

v.

Case No. 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN PILKINGTON,  
MISOOK KIM, and DOES NOS. 1-50,

Defendants.

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**DECLARATION OF RENA ANDOH**

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”), and I provide this declaration in support of Moog’s Opposition to Skyrse’s Motion to Adopt Source Code Protocol.

2. Attached as **Exhibit A** is a true and correct copy of the “Order Granting Stipulated Motion for Altered Source Code Review Procedures in Light of U.S. Pandemic Response” filed in *Softketeers, Inc. v. Regal West Corporation*, 8:19-cv-00519-JVS (C.D. Cal. 2020), ECF No. 427.

3. Attached as **Exhibit B** is a true and correct copy of the Stipulated Protective Order filed in *Syntel Sterling Best Shores Mauritius Limited v. The Trizetto Group, Inc.*, C.A. No. 15-00211 (S.D.N.Y. 2016), ECF No. 207.

4. Attached as **Exhibit C** is a true and correct copy of the Stipulated Protective Order filed in *ImageKeeper LLC v. Wright National Flood Insurance Services LLC*, 2:20-cv-01470-GMN-VCF (D. Nev. 2021), ECF No. 148.

5. I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: August 17, 2022

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/s/ Rena Andoh  
Rena Andoh